## Public Comment Summary: City of Spokane Valley Locally Initiated SMP Amendment 2021 Ecology Public Comment Period, July 26 – August 26, 2019

Prepared by Lauren Bromley, WA Dept. of Ecology, September 16, 2021

Comment Number	Comment Topic	Commenter	Comment	Local Government Response and Rationale
1	21.50.280 Archaeological and Historical Resources	Sydney Hanson, Transportation Archaeologist	In regards to the exemption, I see that docks and bulkheads are exempt from Shoreline Substantial Development permits (pp. 6-7). Down in the Cultural Resources section, it says that surveys will be required for projects in high risk areas (pp. 26). I'm understanding this as exempt projects will not require surveys. This is a little concerning to me, as docks and bulkheads can involve a significant amount of ground disturbance. Archaeological sites tend to cluster along riverbanks (high risk areas), so even small projects can impact resources. Would it be possible to require landowners to adhere to an inadvertent discovery plan even on exempt projects?	The exemption list in Spokane Valley Municipal Code (SVMC) 21.50.110 matches the exemption list in WAC 173-27-040(2). Per WAC 173-27-040 and SVMC 21.50.110 these exemptions are to be construed narrowly.  Additionally, all exempt projects require a Letter of Exemption and in accordance with SVMC 21.50.120. A Letter of Exemption may include and contain conditions of approval to achieve consistency and compliance with the provisions of the SMP and the SMA, including compliance with 21.50.280.  No change is recommended.